

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

UNITED STATES OF AMERICA,)	
PLAINTIFF,)	
)	
v.)	CASE NO. 1:16-CR-231-AT
)	
JAMES D. FRALEY, III,)	
DEFENDANT.)	
)	

UNOPPOSED MOTION TO MODIFY SENTENCE

Comes now Defendant James Fraley, by and through counsel of record, and files this request to modify the conditions of his sentence to allow him: 1) to take an out of district, international, family trip. In support of this motion, the Defendant shows this Honorable Court the following:

1. Defendant has completed the house arrest portion of his sentence without incident.
2. Mr. Fraley has complied with all of the terms and conditions of his sentence to date.
3. Mr. Fraley has paid the entire balance of restitution, \$476,479.95, which includes \$320,479.95 to be paid jointly and severally with James Maloney, who contributed nothing.

4. Therefore, Mr. Fraley respectfully asks this Court to grant him permission to travel on March 8 via Delta flight 1525 to Tampa, Florida where he and his wife and daughters will board the Carnival Legend cruise ship for a six day cruise which travels to Cozumel, Mexico, Belize, Costa Maya, Mexico and then returns to Tampa, Florida on March 15, 2025. The family will stay the night in Tampa at the JW Marriott Tampa Water Street and Return the following day on Delta Flight 2605.
5. The undersigned has consulted with AUSA McClain and the Government does not oppose this motion.

Respectfully requested this 27th day of February, 2025.

Respectfully submitted,

s/Stuart M. Mones
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CERTIFICATE OF SERVICE

THIS IS TO CERTIFY that I have this day served upon all counsel of record a true and correct copy of the foregoing Motion to Consent Modify Defendant's Sentencing by electronic filing through the Court's CM/ECF system.

Dated this 27th day of February, 2025.

s/Stuart M. Mones
STUART M. MONES